

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X  
DR. MILTON PRYSTOWSKY, in his own right and  
as EXECUTOR OR THE ESTATE OF ROSE  
PRYSTOWSKY,

Plaintiff,

v.

**Civil Action No.  
2:07-cv-00072-SDW-MCA**

TGC STORES, INC., ADT SECURITY SERVICES,  
INC., INVACARE CORPORATION, GOLDEN  
BROTHERS, INC. d/b/a GOLDEN  
TECHNOLOGIES, PRIDE MOBILITY PRODUCTS  
CORP. and JOHN DOES 4 – 10

Defendants.

-----X  
PRIDE MOBILITY PRODUCTS CORP.

Third-Party Plaintiff,

v.

DEWERT MOTORIZED SYSTEMS, PHOENIX  
MECANO, INC. and KINGSTEC INDUSTRIES,  
INC., and JOHN DOES 1 – 10

Third-Party Defendants.

**PRIDE MOBILITY  
PRODUCTS  
CORPORATION'S ANSWER  
TO THE CROSSCLAIMS  
AND COUNTERCLAIMS OF  
KINGSTEC INDUSTRIES,  
INC.**

-----X  
Defendant/Third-Party Plaintiff, PRIDE MOBILITY PRODUCTS CORPORATION ("Pride"),  
by its attorneys, MIRANDA SAMBURSKY SLONE SKLARIN VERVENIOTIS LLP, hereby  
Answers the Crossclaims and Counterclaims of Third-Party Defendant, Kingstec Industries, Inc.,  
("Kingstec") upon information and belief, as follows:

**AS AND FOR AN ANSWER TO THE  
CROSSCLAIM AND COUNTERCLAIM FOR CONTRIBUTION**

Pride denies the truth of each and every allegation contained in Kingstec's CROSSCLAIM AND COUNTERCLAIM FOR CONTRIBUTION as they relate to Pride and denies knowledge or information sufficient to form a belief as to the truth of the allegations insofar as they relate to the other defendants.

**AS AND FOR AN ANSWER TO THE CROSSCLAIM AND COUNTERCLAIM  
FOR CONTRACTUAL AND COMMON LAW INDEMNIFICATION**

Pride denies the truth of each and every allegation contained in Kingstec's CROSSCLAIM AND COUNTERCLAIM FOR CONTRACTUAL AND COMMON LAW INDEMNIFICATION as they relate to Pride and denies knowledge or information sufficient to form a belief as to the truth of the allegations insofar as they relate to the other defendants.

**AS AND FOR AN ANSWER TO THE COUNTERCLAIM  
FOR CONTRACTUAL AND COMMON LAW INDEMNIFICATION**

Pride denies the truth of each and every allegation contained in Kingstec's COUNTERCLAIM FOR CONTRACTUAL AND COMMON LAW INDEMNIFICATION.

**AFFIRMATIVE DEFENSES**

Pride incorporates, as if fully set forth herein, all Affirmative Defenses set forth in its Amended Answer dated February 3, 2009, and reserves the rights to assert further affirmative defenses.

**WHEREFORE**, it is demanded that a judgment be entered dismissing Kingstec's Crossclaims and Counterclaims against Pride, with prejudice, together with the costs and disbursements of this action.

DATED:      October 19, 2009

MIRANDA SAMBURSKY SLONE  
SKLARIN VERVENIOTIS LLP  
Attorneys for Defendant  
Pride MOBILITY PRODUCTS CORP.

A handwritten signature in black ink, appearing to read 'Neil L. Sambursky', is written over a horizontal line.

Neil L. Sambursky (NLS-8520)  
240 Mineola Boulevard  
Mineola, New York 11501  
(516) 741-7676  
Our File No.: 09-018

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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EXECUTOR OR THE ESTATE OF ROSE  
PRYSTOWSKY,

Civil Action No.  
2:07-cv-00072-SDW-MCA

Plaintiff,

v.

TGC STORES, INC., ADT SECURITY SERVICES,  
INC., INVACARE CORPORATION, GOLDEN  
BROTHERS, INC. d/b/a GOLDEN TECHNOLOGIES,  
PRIDE MOBILITY PRODUCTS CORP. and JOHN  
DOES 4 – 10

**CERTIFICATE OF  
SERVICE**

Defendants.

-----X  
PRIDE MOBILITY PRODUCTS CORP.

Third-Party Plaintiff,

v.

DEWERT MOTORIZED SYSTEMS, PHOENIX  
MECANO, INC. and KINGSTEC INDUSTRIES, INC.,  
and JOHN DOES 1 – 10

Third-Party Defendants.

-----X

I hereby certify that on this 16<sup>th</sup> day of October, 2009, true and correct copies of:

**PRIDE MOBILITY PRODUCTS CORPORATION'S ANSWER TO THE  
CROSSCLAIMS AND COUNTERCLAIMS OF KINGSTEC INDUSTRIES, INC.**

was served regular mail, postage prepaid to:

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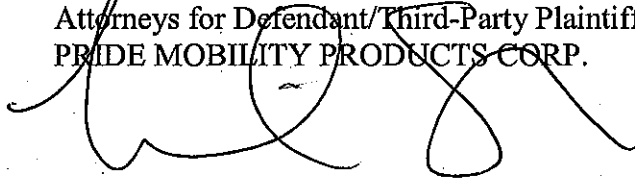
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Dewert Motorized Systems, Phoenix Mecano, Inc.**  
(Appearance not yet entered)

DATED:      October 16, 2009

MIRANDA SAMBURSKY SLONE  
SKLARIN VERVENIOTIS LLP  
Attorneys for Defendant/Third-Party Plaintiff  
PRIDE MOBILITY PRODUCTS CORP.



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